

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re: Suzanne & Sean Turbett) 21 B 11416
)
)
Debtor(s)) Judge Hunt

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

Suzanne & Sean Turbett
402 Prairie Lane
Wilmington, IL 60481

Semrad Law Firm LLC
20 S. Clark St., 28th Fl.
Chicago, IL 60603

Please take notice that on April 1, 2022 at 10:45 AM a representative of this office shall appear before the Honorable Judge LaShonda A. Hunt, or other Judge sitting in her place, and present this motion, a copy of which attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance is necessary or permitted. To appear and be heard for the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/join>, then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666, then enter the meeting ID and passcode.

Meeting ID and Passcode: The Meeting ID for this hearing is 161 165-5696 and the Passcode is 7490911

IF A PARTY OBJECTS TO THIS MOTION AND WANTS IT TO BE CALLED, THE PARTY MUST FILE A NOTICE OF OBJECTION NO LATER THAN TWO (2) BUSINESS DAYS BEFORE THE PRESENTMENT DATE. If a notice of objection is timely filed, the motion will be called on the presentment date. If no notice of objection is timely filed, the court may grant the motion in advance without a hearing.

I certify that this office caused a copy of this notice to be delivered to the attorneys through the CM/ECF system and to the above listed debtor by depositing it in the U.S. Mail on March 25, 2022.

_____/s/
For Glenn Stearns, Trustee

MOTION TO CONVERT TO CHAPTER 7

Now Comes Glenn Stearns, Chapter 13 Trustee, and requests conversion to Chapter 7 of the above case pursuant to 11 U.S.C. §1307(c) and in support thereof, states the following:

1. On October 5, 2021, the debtor(s) filed a petition under Chapter 7.

2. The debtors have an ownership interest in real estate at 402 Prairie Lane, Wilmington, IL disclosed on the debtors' Schedule A.
3. The Chapter 7 Trustee received permission from this Court to market the property as the Chapter 7 Trustee believed that there would be net proceeds to the estate after the sale for the benefit of creditors.
4. As a result, the debtors converted their Chapter 7 case to a Chapter 13 case.
5. However, since the conversion, the debtors have not made any plan payments or proposed a feasible plan.
6. In addition, the debtors have not filed an amended schedule I and provided paystubs for the debtor's new employment.
7. The estate would be best served by a conversion to Chapter 7 and appointment of a Chapter 7 Trustee to administer the debtor's assets for the benefit of creditors.

WHEREFORE, the Trustee prays that this case be converted to a case under Chapter 7 pursuant to §1307(c), or for such other and further relief as this court deems proper.

Respectfully Submitted;
Glenn Stearns, Trustee

/s/

By: Gerald Mylander

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Rd., Suite 650
Lisle, IL 60532